

## **REMARKS**

**[0001]** Applicant's attorney respectfully requests reconsideration and allowance of all of the claims of the application. Claims 1-2 and 5-19 and 21-27 are presently pending. Claims 15, 26, and 27 are amended herein.

### **Formal Request for an Interview**

**[0002]** If the Examiner's reply to this communication is anything other than allowance of all pending claims, then I formally request an interview with the Examiner. I encourage the Examiner to call me—the undersigned representative for the Applicant—so that we can talk about this matter so as to resolve any outstanding issues quickly and efficiently over the phone.

**[0003]** Please contact me to schedule a date and time for a telephone interview that is most convenient for both of us. While email works great for me, I welcome your call as well. My contact information may be found on the last page of this response.

### **Allowable Subject Matter**

**[0004]** Applicant would like to thank the Examiner for indicating allowability of claims 1, 2, and 5-14. These claims have not been substantively amended herein, and therefore remain allowable.

## **Substantive Matters**

### **Claim Rejections under § 102**

**[0005]** The Examiner rejects claims 15-19 and 21-27 under § 102. For the reasons set forth below, the Examiner has not shown that the cited references anticipate the rejected claims.

**[0006]** Accordingly, Applicant respectfully requests that the § 102 rejections be withdrawn and the case be passed along to issuance.

**[0007]** The Examiner's rejections are based upon the following references:

- **Butler 6,678,707:** *Butler* US Patent No. 6,678,707 (issued January 13, 2004); and
- **Smeets 6,253,236:** *Smeets* US Patent No. 6,253,236 (issued November 2, 2007).

## **Anticipation Rejections**

**[0008]** Applicant submits that the anticipation rejections are not valid because, for each rejected claim, no single reference discloses each and every element of that rejected claim.<sup>1</sup> Furthermore, the elements disclosed in the single reference are not arranged in the manner recited by each rejected claim.<sup>2</sup>

### **Based upon *Butler***

**[0009]** The Examiner rejects claims 15-19, and 21-27 under 35 U.S.C. § 102(e) as being anticipated by *Butler*. Applicant respectfully traverses the rejection of these claims. Based on the reasons given below, Applicant asks the Examiner to withdraw the rejection of these claims.

### **Independent Claims 15, 26, and 27**

**[0010]** Applicant submits that *Butler* does not anticipate these claims because it does not disclose the following elements as recited in these claims:

- “a truncated linear congruential generator”

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<sup>1</sup> “A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); also see MPEP §2131.

<sup>2</sup> See *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

**[0011]** Each of these claims, as amended, recites “a truncated linear congruential generator” as well as various additional recitations relevant to each claim focus. *Butler* simply does not disclose generating numbers of a pseudo-random sequence and calculating numbers having a chaos-based pseudo-random value. Further, there is nary a mention of the terms chaos, chaos-based, or chaotic map anywhere in *Butler*. Further, Applicant’s attorney specifically rejects the tenet that random-based and chaos-based are interchangeable synonyms as contended by the Examiner. This is simply not true.

**[0012]** Notwithstanding these clear differences discussed above, these claims have been amended to recite “a truncated linear congruential generator.” There is no disclosure whatsoever in *Butler* that can be remotely construed to be a truncated linear congruential generator as recited in these claims. *Butler* merely addresses the problem of generating truly random numbers (col. 4, lines 35-40). As a result, *Butler* cannot be used in cryptographic codes in which the receiver of the data needs to reconstruct the random number sequence to decrypt the data because *Butler* generates a sequence of truly random numbers that is unpredictable. Generating a truly random sequence of numbers that cannot be repeated (as taught in *Butler*) is not the same generating chaos-based pseudo-random values (as recited in these claims and supported in the application at col. 6, lines 6-9).

**[0013]** Consequently, *Butler* does not disclose all of the elements and features of these claims. Accordingly, Applicant asks the Examiner to withdraw the rejection of these claims.

### Dependent Claims 16-25

**[0014]** These claims ultimately depend upon independent claim 15. As discussed above, claim 15 is allowable. It is axiomatic that any dependent claim which depends from an allowable base claim is also allowable. Additionally, some or all of these claims may also be allowable for additional independent reasons.

### Based upon *Smeets*

**[0015]** The Examiner rejects claims 15-19 and 21-27 under 35 U.S.C. § 102(e) as being anticipated by *Smeets*. Applicant respectfully traverses the rejection of these claims. Based on the reasons given below, Applicant asks the Examiner to withdraw the rejection of these claims.

### Independent Claims 15, 26, and 27

**[0016]** Applicant submits that *Smeets* does not anticipate these claims because it does not disclose the following elements as recited in these claims:

- “a truncated linear congruential generator”

**[0017]** As discussed above, each of these claims recites “a truncated linear congruential generator” as well as various additional recitations relevant to each claim focus. Like *Butler* above, *Smeets* simply does not teach or, much less, is even cognizant of the concept of chaos-based pseudo-random value generation involving any generator let alone a truncated linear congruential generator.

**[0018]** Consequently, *Smeets* does not disclose all of the elements and features of this claim. Accordingly, Applicant asks the Examiner to withdraw the rejection of this claim.

*Dependent Claims 16-19 and 21-25*

**[0019]** These claims ultimately depend upon independent claim 15. As discussed above, claim 15 is allowable. It is axiomatic that any dependent claim which depends from an allowable base claim is also allowable. Additionally, some or all of these claims may also be allowable for additional independent reasons.

## **Conclusion**

**[0020]** All pending claims are in condition for allowance. Applicant's attorney respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the **Examiner is urged to contact me before issuing a subsequent Action.** Please call or email me at your convenience.

**[0021]** Any additional fees required as a result of this amendment have been paid from the below-referenced deposit account as filed herewith. Should further payment be required to cover such fees you are hereby authorized to charge such payment to Deposit Account No. 07-1897.

Respectfully Submitted,

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